

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MELVIN GENE TUCKER II,

*Plaintiff,*

v.

MICHIGAN STATE UNIVERSITY,  
TERESA K. WOODRUFF, ALAN  
HALLER, and BRIAN QUINN, each  
as an employee and member of the  
Administration of Michigan State  
University sued in their individual  
capacities jointly and severally;  
DIANNE BYRUM, DAN KELLY,  
SANDY PIERCE, KELLY TEBAY,  
DENNIS DENNO, RENEE KNAKE  
JEFFERSON, BRIANNA T. SCOTT,  
and REMA VASSAR, each a member  
of the BOARD OF TRUSTEES of  
Michigan State University, sued in  
their individual capacities, jointly and  
severally,

*Defendants.*

Case No. 1:24-cv-00795

Hon. Paul L. Maloney,  
U.S. District Judge

Hon. Phillip J. Green,  
U.S. Magistrate Judge

**Oral Argument Requested**

**DEFENDANTS' MOTION TO DISMISS**

Defendants Board of Trustees of Michigan State University (incorrectly named "Michigan State University" in the Complaint), Teresa K. Woodruff, Alan Haller, Brian Quinn, Dianne Byrum, Dan Kelly, Sandy Pierce, Kelly Tebay, Dennis Denno, Renee Knake Jefferson, Brianna T. Scott, and Rema Vassar (collectively, the "Defendants"), by their undersigned attorneys, move this Court for an Order

dismissing Plaintiff's Complaint with prejudice as to all counts against them pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a plausible claim for relief. In support of this motion, Defendants rely upon the accompanying brief in support and the documents attached as exhibits to Plaintiff's Complaint.

WHEREFORE, Defendants respectively ask this Court to dismiss Plaintiff's Complaint with prejudice and grant any other relief as may be just and appropriate.

Dated: October 23, 2024

Respectfully submitted,

/s/ Terri L. Chase

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